

IN THE CIRCUIT COURT FOR JEFFERSON COUNTY, TENNESSEE
AT DANDRIDGE

KATHI WEBSTER,

Plaintiff,

vs.

WAL-MART STORES, INC.,

Defendant.

NO 2 3758-11
JURY TRIAL DEMANDED

COMPLAINT

1. The Plaintiff, **Kathi Webster**, brings this Complaint against the Defendant, **Wal-Mart Stores, Inc.**, and files a copy of her Complaint, verified by her attorney as being true and correct for the purpose of accompanying the summons, for damages in an amount of no less than Two Hundred Thirty-Five Thousand Dollars (\$235,000).

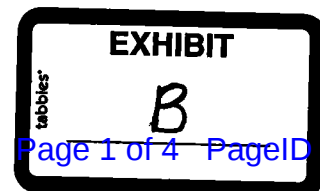
2. The Plaintiff, **Kathi Webster**, is a citizen and resident of Grainger County, Tennessee, residing at 826 Bone Road, Rutledge, Tennessee 37861.

3. The Defendant, **Wal-Mart Stores, Inc.**, is a corporation with its principal place of business being in the State of Arkansas, with an agent for service of process being: C.T. Corporation System, 800 South Gay Street, Suite 2021, Knoxville, Tennessee 37929-9710.

4. On or about May 4, 2013, the Plaintiff, **Kathi Webster**, was shopping at the **Wal-Mart Store** location in Jefferson City, Tennessee. While at the **Wal-Mart Store** location in Jefferson City, Tennessee, there was a brick paver laying in the

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AT 1:00 O'CLOCK P.M.
PENNY O. MURPHY, CLERK

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pathway of customer traffic in the Home & Garden Center.

5. As the Plaintiff, **Kathi Webster**, was browsing through the Home & Garden Center, she unknowingly came upon the brick paver laying in the pathway of customer traffic and tripped and fell and sustained serious and disabling injuries.

6. The Defendant, **Wal-Mart Stores, Inc.**, its agents and employees were negligent in the following:

a. Failing to properly keep their aisles clean and removed of obstacles which could cause customers in the store to fall and injure themselves.

b. Negligently failing to inspect the walkways to insure the paths of travel for customers remain free and clear of dangerous and unsafe conditions such as the ones mentioned herein;

c. Allowing dangerous conditions to exist in the area of customer walkways, which the Defendant, its agent and employees knew or should have known was hazardous and likely to cause and posed a tripping hazard;

d. Negligently failing to insure that customers have a safe and unobstructed path of travel throughout the store and/or Lawn & Garden Center of the Store;

e. Negligently failing to warn the Plaintiff of the aforementioned hidden and dangerous conditions, which would not have been obvious to the Plaintiff or to other customers traveling through the store;

f. Negligently failing to properly train and supervise employees and agents to promulgate and enforce adequate safety policies and procedures.

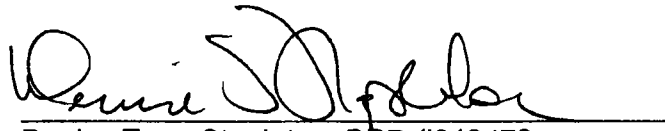
7. As a direct and proximate result of the Defendant's negligence, the Plaintiff, **Kathi Webster**, was caused to fall and sustain serious and disabling injuries.

8. The Plaintiff, **Kathi Webster**, brings this civil action against the Defendant, **Wal-Mart Stores, Inc.**, for personal injuries and damages, medical bills and expenses, which she was caused to receive on or about May 4, 2013.

9. The Plaintiff, **Kathi Webster**, brings this civil action against the Defendant, **Wal-Mart Stores, Inc.**, for injuries which she was caused to receive on or about May 4, 2013. As a result of this accident, **Kathi Webster** has sustained serious and disabling injuries. Said injuries to the Plaintiff have resulted in permanent disability and have impaired her capacity for business and the enjoyments and pleasures of life. As a result of these injuries, Plaintiff has incurred and shall continue to incur medical bills as well as pain and suffering.

WHEREFORE, the Plaintiff, **Kathi Webster**, asks for judgment against the Defendant, **Wal-Mart Stores, Inc.**, in an amount of no less than Two Hundred Thirty-Five Thousand Dollars (\$235,000) and asks for a jury in the trial of this cause.

Respectfully submitted,


Denise Terry Stapleton, BPR #012478


Of Counsel:

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COST BOND

We acknowledge ourselves as sureties in this cause for the bill of costs.


Denise Terry Stapleton

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